

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND, SOUTHERN DIVISION

NICOLE M. BRUNO)	
Plaintiff)	
)	Civil Action, File Number
vs.)	<u>AMD 03-358</u>
DONALD ENSTE dba DANDY DONS)	
Defendant)	
and)	
NO STRESS HERE, INC.)	
2516 Witz Road)	
Kingsville, MD 21087)	
Baltimore County)	

AMENDED COMPLAINT

Count I

(Negligence - Defendant Donald Enste dba Dandy Dons)

1. Plaintiff is a citizen of the State of Pennsylvania and Defendant is a citizen of
and
has his principal place of business in, the State of Maryland. The matter in controversy exceeds,
exclusive of interest and costs, the sum specified by 28 U.S.C. § 1332.
2. On June 7, 1998, the Plaintiff was injured when she attempted to ride a bicycle
rented from the Defendant and the bicycle seat fell off.
3. The Defendant breached his duty of care to the Plaintiff by failing to properly
maintain, service and inspect the bicycle.

4. As a result of the Defendant s negligence, the Plaintiff fell sustaining injuries, including permanent injury to her left knee which required surgery, suffered great pain of body and mind, and incurred expenses for medical attention and hospitalization amounting to over \$8,000.00.

Wherefore, Plaintiff demands judgment against Defendant, **Donald Enste dba Dandy Dons**, in the sum of \$500,000.00 and costs.

Count II

(Negligence - Defendant No Stress Here, Inc.)

5. Plaintiff hereby incorporates paragraphs 1-4 herein.

Wherefore, Plaintiff demands judgment against Defendant, **No Stress Here, Inc.**, in the sum of \$500,000.00 and costs.

Count II

(Joint and Several Liability)

6. Plaintiff hereby incorporates paragraphs 1-5 herein.

7. The Defendants, **Donald Enste dba Dandy Dons** and **No Stress Here, Inc.**, were all jointly and severally negligent as aforesaid.

8. As a direct and proximate result of the joint negligence of the Defendants, as aforesaid, the Plaintiff sustained the injuries and damages as aforesaid.

Wherefore, Plaintiff demands judgment against Defendants, **Donald Enste dba Dandy Dons** and **No Stress Here, Inc.**, in the sum of \$500,000.00 and costs.

Jury Demand

Plaintiff hereby demands trial by jury, pursuant to FRCP Rule 38.

Respectfully submitted,

DONAHUE, SEIDMAN & SCHREYER, LLC

By: /s/

Danny R. Seidman

8 Post Office Road

Waldorf, MD 20602

(301) 870-9997

Federal Bar No.: 06441

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of June , 2003, I electronically transmitted, to Andrew B. Greenspan, Esquire at greensa@nationwide.com a copy of the Amended Complaint and that I will retain the original of this document in my possession, without alteration, until the case is concluded in this Court, the time for noting an appeal has expired, and any appeal noted has been decided.

Respectfully submitted,

DONAHUE, SEIDMAN & SCHREYER, LLC

By: _____ /s/

Danny R. Seidman

8 Post Office Road

Waldorf, MD 20602

(301) 870-9997

Federal Bar No.: 06441

Attorney for Plaintiff